

1) I would like to comment on ET 01-278, specifically clause 17. As a licensed amateur radio operator, I am very concerned about the impact on the amateur radio service operations in the 70 centimeter band by the SAVI Petition. The SAVI Petition would result in a proliferation of mobile transmitter into all sorts of delivery trucks. With the long transmit times at the high RFI levels permitted by the SAVI Petition, there is bound to be interference to existing licensed services in the frequency range.

2) One of the common uses of the RFID tag system is expected to be the postal service and package delivery companies (e.g. FedEx, UPS, etc). These companies will be looking for an RFID tag system that they can use throughout the world. FCC part 2.106, and the international table of frequency allocations (p 35 in the 10-1-00 edition) describe the international usage of the proposed band.

a) A review of the subclauses 2.106 S5.268 to S5.271 does not identify ANY nation that uses 425 MHz as a transition frequency between band usage segments. Therefore the choice of 425 MHz as the lower frequency limit has no justification, based on worldwide frequency allocation information.

b) From the subclauses 2.106 S5.272 to S5.283, the many uses by the 430-435 MHz subband are documented. Part of the proposed band is used as an ISM band by Germany and a small handful of surrounding countries. France and India use a segment for space communications. Other subband uses are documented for various countries. All of these varying allocations demonstrate that the worldwide usage of the proposed band is quite fragmented, and not universally available to be used by a single commercial technology, such as the SAVI RFID tag proposal. Therefore, it seems very difficult to justify that this band is the best suited for the proposed RFID tag technology!